

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

PAUL SHAO

Plaintiff,

v.

ALLSTATE INSURANCE COMPANY,

Defendant.

No.: 1:23-cv-00809

**DEFENDANT ALLSTATE INSURANCE COMPANY’S MOTION FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF PAUL SHAO’S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Defendant Allstate Insurance Company (“Allstate” or “Defendant”) respectfully requests an extension of time to file its Response to Plaintiff Paul Shao’s (“Shao” or “Plaintiff”) Motion for Partial Summary Judgment of no more than seven calendar days, or December 27, 2024. In support thereof, Allstate states as follows:

1. On December 6, 2024, this Court entered an Order granting Allstate an extension up to and including December 20, 2024 to respond to Shao’s Motion for Partial Summary Judgment (Dkt. 176). Counsel for Allstate respectfully requests an additional seven calendar days to submit its Response as its client needs additional time to review the Response due to the holidays.

2. Counsel for Allstate reached out to Shao to request his consent to this motion. As of the time of this filing, counsel for Allstate did not hear back from Shao. Counsel for Allstate did, however, indicate that Allstate does not oppose Shao seeking additional time from the Court due to the holidays.

3. Accordingly, Allstate respectfully requests this Court extend the deadline to respond to Plaintiff's Motion for Partial Summary Judgment by seven days or up until December 27, 2024.

4. Allstate is making this request in good faith and not for the purpose of undue delay.

WHEREFORE, Allstate respectfully requests that this Court enter an Order: (a) extending the deadline for filing its Response to Plaintiff's Motion for Partial Summary Judgment to December 27, 2024; and (b) for any and all other relief that this Court deems proper and just.

Dated: December 17, 2024

Respectfully submitted,

/s/ Laura Seferian

Laura Seferian (Va. Bar No.: 92510)

J. Scott Humphrey (admitted *pro hac vice*)

Katie M. Burnett (admitted *pro hac vice*)

Meghan Golden (admitted *pro hac vice*)

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*Attorneys for Defendant Allstate Insurance
Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 17th of December a copy of the foregoing *Defendant Allstate Insurance Company's Motion for Extension of Time to Respond to Plaintiff Paul Shao's Motion for Partial Summary Judgment* was emailed to:

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paulyshao@gmail.com

/s/ Laura Seferian

Laura Seferian